SBIR Technical Questions for NIH

August 20, 2003

Several issues need quick and definitive clarification given the short time period between now and the October pilot.

Background

- The October 1 pilot is about a month and half away.

- The current paper submission deadline is Wednesday October 1.

- According to NIH, "An unsolicited application will be considered on time if it is received by or mailed on or before the published receipt date and a proof of mailing is provided. Proof of timely mailing consists of one of the following: a legibly dated U.S. Postal Service postmark or a dated receipt from a commercial carrier or the U.S. Postal Service." (http://grants1.nih.gov/grants/funding/phs398/section_2.html).

- Based on the above, the current deadline is essentially the latest time that a courier will pick up a package on October 1 (probably about 7 or 8 p.m. local time).

- UPS or the Post Service is not "penalized" if they deliver the package late. That is, if UPS takes two days instead of one, the application is still accepted automatically.

Assumptions

- Until an official e-grant deadline policy is in place, an electronic "deadline" should conform to the above NIH Guideline.

- A Web or centralized service is analogous to a "commercial carrier" in that it "accepts a package for delivery" and delivers that package to NIH.

- Current policy does not state how long it takes for the "commercial carrier" to "deliver the mailing", but in the case of USPS it could easily be 7 days if the package was mailed from Alaska/Hawaii.

- Since the ticket cannot be requested until the application is complete and verified by the SBIR software, delivery of the ticket is analogous to the delivery of the packaged grant application.

- During the pilot, all SBIR companies will probably be actively involved and all can be considered "commercial carriers." No matter what the delivery method, the "latest possible" deadline should be the same for all SBIR solutions.

- Local submission software/forms that communicate directly with the NIH/Grants.gov without any SBIR involvement are more analogous to the old approach where folks would drop off their application on their own (this is of course no longer acceptable due to security concerns, but the precedent is in place). That approach is thus not the same as an electronic "commercial carrier" and should have different requirements. The logical deadline would thus be 11:59pm local NIH time.

Questions

1. Our read of the above NIH policy is that the SBIR software "delivery receipt" that is provided to the submitter can be anytime on October 1 up until 11:59 p.m. Correct?

2. SBIR solutions that are "commercial carriers" should be allowed "ample time" to deliver the package. Given the pilot nature of this project, we believe a full week should be allowed. In the future this can/should be trimmed back, but a delivery time of 1 business day is not unreasonable (and will help with traffic/hardware problems). Is this okay?

3. Assuming the above is acceptable, "Commercial carriers" are currently not penalized for weekends and holidays. Thus SBIR "Commercial carriers" should be given these days to deliver the package. Is this okay?

4. Just as UPS can choose to pick up at 6 or 8, the actual deadline on the receipt date should be up to the SBIR "Commercial carriers" (up until 11:59 p.m., of course). The time is then a business decision. One company could then decide to set the time at 5 p.m. local time (since they have staff available) and lose the business of folks who want a service that is available until midnight. Another company could choose to "stay open" and bear the additional costs. Is this okay?

Answer: All proposals submitted electronically will be due at 5:00 p.m. local time for the institution submitting the proposal. The CGAP system will accept proposals after this time, but it will be the prerogative of CSR to accept late applications and process them for review or reject them back to the applicant. Receipt of the application is defined as the request for a "ticket" from the applicant to the CGAP system. The time logged as the "official" receipt time will be the time of the request and not the time that the ticket was issued. All deadlines will be for normal business days and in the event that a date is chosen that falls on a weekend or holiday, the deadline will be the next normal business day.

5. Can any PI and any organization who plans to submit an R01 application participate in the October 1 pilot?

Answer: The October pilot (no date) will be available to any PI but only for modular grants. However, we would like to know in advance who will submit which application so we can track the applications and make sure that the applications are not affected by any technology glitches.

Yes, both Type 1 (October submission deadline) and Type 2 (November submission deadline) grants (modular budgets) will be considered.

6. If not, are there more detailed instructions on who can qualify?

Answer: We will be contacting all potential service providers to identify candidates with a package of instruction or selection criteria.

7. If more detailed instructions are not available, what is the process for getting NIH approval and how fast will NIH provide this?

Answer: We are developing the "recruitment" materials. Essentially we will try to get a sample of up to 50 applications coming in via electronic means. You should hear from NIH within 2 weeks. In the meantime, if you have candidate institutions and PIs, we would love to hear from you and start tracking the list of candidates.